

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Charles K. Verhoeven (Bar No. 170151)  
3 charlesverhoeven@quinnemanuel.com  
4 David A. Perlson (Bar No. 209502)  
5 davidperlson@quinnemanuel.com  
6 Melissa Baily (Bar No. 237649)  
7 melissabaily@quinnemanuel.com  
8 John Neukom (Bar No. 275887)  
9 johnneukom@quinnemanuel.com  
10 Lindsay Cooper (Bar No. 254886)  
11 jordanjaffe@quinnemanuel.com  
12 50 California Street, 22<sup>nd</sup> Floor  
13 San Francisco, California 94111-4788  
14 Telephone: (415) 875-6600  
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **DECLARATION OF JAMES JUDAH IN  
24 SUPPORT OF PLAINTIFF WAYMO  
25 LLC'S ADMINISTRATIVE MOTION TO  
26 FILE UNDER SEAL ITS  
27 SUPPLEMENTAL BRIEF ON ANTHONY  
28 LEVANDOWSKI'S ASSERTION OF  
INDIVIDUAL ATTORNEY-CLIENT  
PRIVILEGE AND THE SCOPE OF  
UBER'S WAIVER**

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO LLC; OTTO TRUCKING  
18 LLC,

19 Defendants.

20

21

22

23

24

25

26

27

28

1 I, James Judah, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal confidential information in its Supplemental Brief on Anthony Levandowski’s Assertion of an  
 8 Individual Attorney-Client Privilege and the Scope of Uber’s Waiver (“Waymo’s Administrative  
 9 Motion”). Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Supplemental Brief on Anthony Levandowski’s Assertion of an Individual Attorney-Client Privilege and the Scope of Uber’s Waiver (Waymo’s Brief)	Highlighted in Blue	Defendants
Exhibit 1 to Waymo’s Brief	Entire Document	Defendants

15       3. Waymo’s Brief and Exhibit 1 thereto contain information that Defendants have  
 16 designated as confidential and/or highly confidential.

17       4. Waymo takes no position on the merits of sealing the designated material, and expects  
 18 Defendants to file one or more declarations in accordance with the Local Rules.

19       I declare under penalty of perjury under the laws of the State of California that the foregoing is  
 20 true and correct, and that this declaration was executed in San Francisco, California, on August 25,  
 21 2017.

22 By /s/ James Judah

23 James Judah

24 Attorneys for WAYMO LLC

1                   **SIGNATURE ATTESTATION**

2                   Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
3 filing of this document has been obtained from James Judah.

4  
5                   */s/ Charles K. Verhoeven*  
6                   Charles K. Verhoeven  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28